

Jeffrey Rhodes  
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*Attorney for the Motors  
Liquidation Company Avoidance  
Action Trust, by and through Wilmington  
Trust Company, solely in its capacity as  
Trust Administrator and Trustee*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a  
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (REG)  
(Jointly Administered)

Debtors.

-----X

**MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

I, Jeffrey Rhodes, a member in good standing of the bars of the District of Columbia and the State of Maryland and the bars of the United States Supreme Court, the United States Courts of Appeals for the Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Eighth Circuit and the District of Columbia Circuit, and the United States District Courts for the District of Maryland and the District of Columbia, request admission, *pro hac vice*, before the Honorable Robert Gerber, to represent the Motors Liquidation Company Avoidance Action Trust by and through the Wilmington Trust Company, solely in its capacity as trust administrator and trustee, in the above-captioned bankruptcy case, and in all proceedings arising in, arising under, and related to the above-captioned bankruptcy case.

My address is Dickstein Shapiro LLP, 1825 Eye Street, N.W., Washington, D.C.  
20006-5403. My email address is [rhodesj@dicksteinshapiro.com](mailto:rhodesj@dicksteinshapiro.com). My telephone number is  
(202) 420-3150.

The filing fee of \$200.00 has been submitted with this motion for *pro hac vice*  
admission.

Dated: Washington, DC  
May 11, 2015

DICKSTEIN SHAPIRO LLP

/s/ Jeffrey Rhodes  
Jeffrey Rhodes  
1825 Eye Street, NW  
Washington, DC 20006  
Telephone (202) 420-3150  
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**EXHIBIT A**

**PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re:

MOTORS LIQUIDATION COMPANY, f/k/a  
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (REG)  
(Jointly Administered)

Debtors.  
-----X

**ORDER GRANTING ADMISSION TO PRACTICE, *Pro Hac Vice***

Jeffrey Rhodes, a member in good standing of the bars of the District of Columbia and the State of Maryland and the bars of the United States Supreme Court, the United States Courts of Appeals for the Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Eighth Circuit and the District of Columbia Circuit, and the United States District Courts for the District of Maryland and the District of Columbia, having requested admission, *pro hac vice*, to represent the Motors Liquidation Company Avoidance Action Trust by and through the Wilmington Trust Company, solely in its capacity as trust administrator and trustee in the above-captioned bankruptcy case; it is hereby

**ORDERED**, that Jeffrey Rhodes, Esq., is admitted to practice, *pro hac vice*, in the above-captioned bankruptcy case, and in all proceedings arising in, arising under, and related to the above-captioned bankruptcy case in the United States Bankruptcy Court, Southern District of New York, provided that the filing fee has been paid.

Dated: New York, New York  
May \_\_, 2015

\_\_\_\_\_  
Honorable Robert Gerber  
United States Bankruptcy Judge